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Gary R. Mitchell
1851 Laurinda Dr.
San Jose, CA 95124

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Office of the Secretary,
Federal communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC MAIL ROOM

RE: ET Docket 93-40, NPRM for allocation of 219-220 MHz to amateur radio on a secondary basis

I'm glad to see the FCC consider allocating 219-220 MHz to amateur radio (even on a secondary basis) primarily for digital (packet) networks. Although, I'm disappointed that the 220-222 MHz segment was not returned to the amateurs.

COMMENT ON BAUD RESTRICTIONS:

Operation in this band is proposed with 100 KHz bandwidth and 56 Kilobaud data rate limits--I am strongly opposed to data rate (baud) limits! There is no reason for this--bandwidth limitations with the usual out-of-band radiation specifications are completely adequate.

Restricting data rates stifles innovation, experimentation, and unnecessarily limits traffic throughput. This is in conflict with your own regulation! Part 97.1(b) states: "...*(one of the purposes of amateur radio is the) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.* And paragraph 97.1(c) states: "*Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.*" With baud rate